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DEPT. OF ECOLOGY

Seattle Plant
5400 West Marginal Way S.W.
Seattle, Washington 98106
206/937-8025
Fax 206/932-3803

HOLNAM INC

June 13, 1994

FILE: DOE 3A

Lisa Zinner, P.E.
Environmental Engineer, Water Quality Program
Department of Ecology
Northwest Regional Office
3190 160th S.E.
Bellevue, WA 98008-5452

Lisa,

Our EPA Forms 1, 2E, & 2F for NPDES Permit No. WA-000223-2 are attached for your review and approval.

We sampled per our discussion on February 24, 1993 as follows:

For EPA Form 3510-2F, VII, Part A we sampled for:

- Oil & Grease
- Biological Oxygen Demand (BOD5)
- Total Suspended Solids (TSS)
- Nitrogen as Nitrate and Nitrite (N + N)
- Total Kjeldahl Nitrogen (TKN)
- Total Organic Carbon (TOC) (instead of Chemical Oxygen Demand)
- Total Phosphorous (additional to form requirements)
- pH

For EPA Form 3510-2F, VII, Part B we sampled for the following total metals:

- Antimony
- Arsenic
- Beryllium
- Cadmium
- Chromium
- Copper
- Lead
- Nickel
- Selenium
- Silver
- Thallium
- Zinc

Sampling locations were per our plan of February 21, 1993 (attached) which was approved by you via phone conversation on February 24, 1993.

USEPA SF



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Please note that the outfalls are numbered differently than on our EPA Form 1 submitted on December 11, 1990. They are numbered as follows:

OLD #	NEW #	TYPE	LATITUDE			LONGITUDE		
	1	Recycled water	47 ⁰	33'	19"	122 ⁰	20'	43"
002*	2	Non-contact cooling water & Packhouse roof drain	47 ⁰	33'	18"	122 ⁰	20'	40"
001*	3	Non-contact cooling water & Packhouse roof drain	47 ⁰	33'	18"	122 ⁰	20'	38"
	4	Dock trench & plant drainage	47 ⁰	33'	17"	122 ⁰	20'	32"
	5	Dock trench drainage	47 ⁰	33'	15"	122 ⁰	20'	31"
	6	Dock trench drainage	47 ⁰	33'	9"	122 ⁰	20'	28"
	7	Chemithon's outfall	47 ⁰	33'	9"	122 ⁰	20'	28"
	8	Recycled water	47 ⁰	33'	9"	122 ⁰	20'	28"

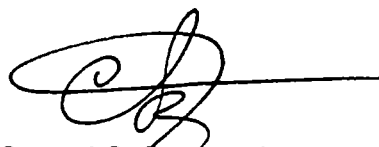
* Please note that these coordinates are different than those submitted in 1990. Coordinates have been confirmed with Mr. Jim Pearson of EPA Region X. Coordinates are from South Seattle 1:25,000 USGS map dtd 1983.

We plan to recycle plant storm water from the central corridor north of the main office and mill buildings (outfall #4) in a manner similar to that at our northwest (outfall #1) and south east (outfall #8) outfalls.

My understanding per our discussion on May 17, 1994 for NPDES application is that:

1. Outfalls 2 and 3 will be covered on EPA Form 2E (Facilities which do not Discharge Process Wastewater)
2. Outfalls 4, 5, and 6, will be covered on EPA Form 2F (Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity)
3. Outfalls 1 and 8 are excluded as they are recycled
4. We will not address outfall 7 as the water source is from Chemithon

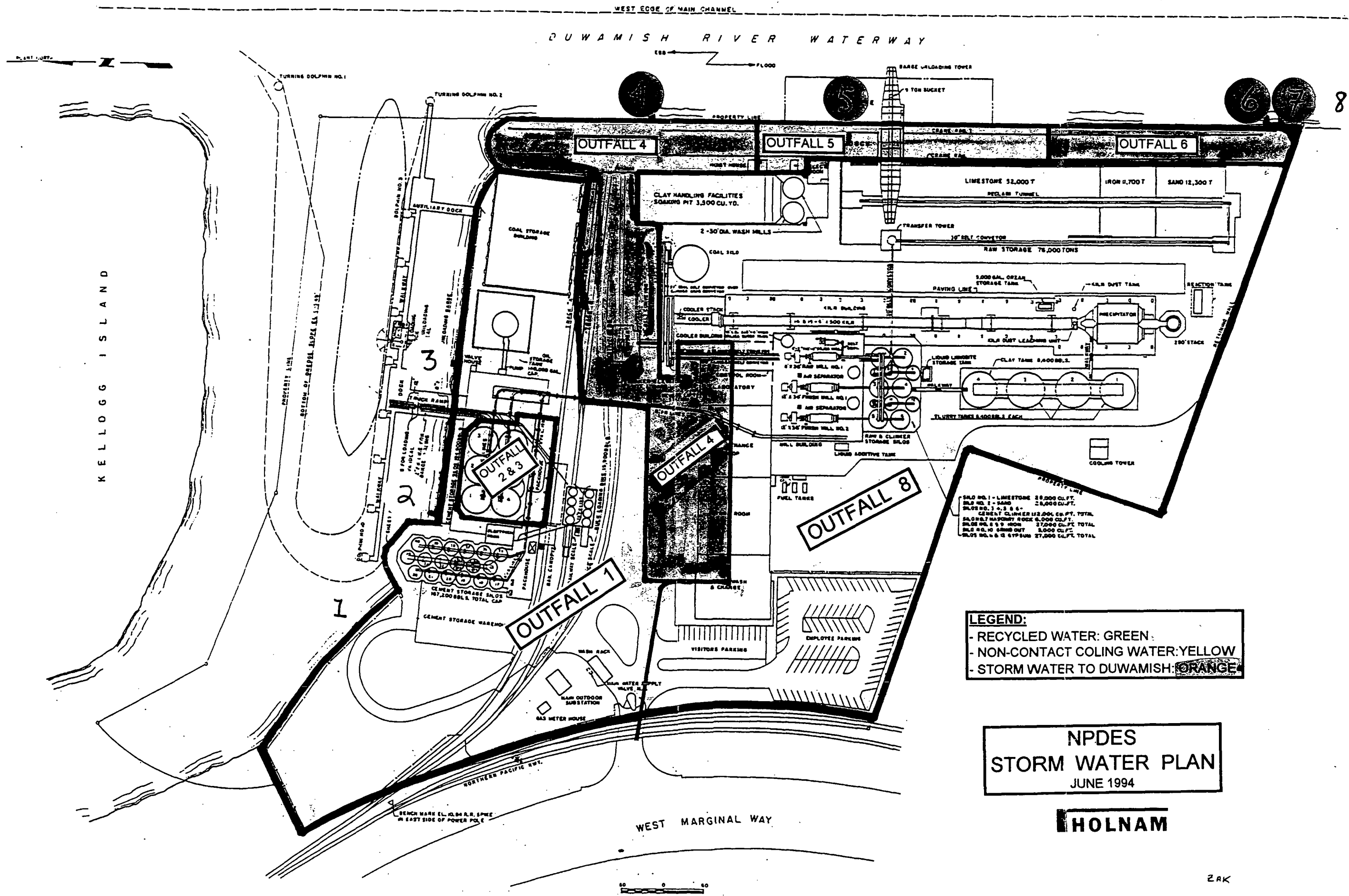
Please call if you have any questions.



Conrad C. Szymczak
Environmental / Process Engineer

cf:
Kerry Sutton, Corporate Environmental
Steve High, Tacoma Environmental Sciences, Inc.

Encls:
- EPA Form 1
- EPA Form 2E
- EPA Form 2F
- Laboratory analysis
- Storm event sampling backup data
- Holnam letter dtd February 21, 1994
- Holnam letter dtd December 11, 1990
- EPA Form 1 (1990 submittal)
- Holnam letter dtd June 10, 1994



LEGEND:
- RECYCLED WATER: GREEN
- NON-CONTACT COLING WATER: YELLOW
- STORM WATER TO DUWAMISH: ORANGE

**NPDES
STORM WATER PLAN
JUNE 1994**

HOLNAM

ZAK

Seattle Plant
5400 West Marginal Way S.W.
Seattle, Washington 98106
206/937-8025
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February 21, 1994

HOLNAM INC

Lisa Zinner, P.E.
Environmental Engineer, Water Quality Program
State of Washington
Department of Ecology
Northwest Regional Office
3190 160th S.E.
Bellevue, WA 98008-5452

*Verbal approval
of Plan granted
24 FEB 94
Phonecon w/
LISA*

RE: Holnam, Inc. Seattle Plant NPDES Permit No. WA-000223-2

Dear Lisa,

Just a quick note to update you on our status.

First, we have contracted with Tacoma Environmental Services, Inc. to assist in the conduct of storm water sampling and analysis.

Second, on February 16, 1994, we installed an oil/particulate filter to the overflow of our raw reclaim sump on the southeast corner of our property. Please see attached drawing of this unit.

Third, we recently completed connecting all storm water drainage in the northwest portion of our plant to our water reclaim system. This means that we now recycle all plant storm water except down the central corridor north of the main office and mill buildings, and our dock along the Duwamish, just east of our raw material reclaim stock piles.

I think you'll be pleased to know that during the heavy rains this week the sump pumps in the northwest and southeast corners of our plant did their jobs!

Fourth, we have eight outfalls on our plant. Of these, two are non-contact cooling water, two are recycled into our process, three drain the dock area on the eastern edge of our property, and one is an outfall that runs through our property but emanates from and is fed totally by our neighbor, Chemithon. To further complicate matters, Alaska Marine Lines has an outfall south of our property that empties toward our property.

Of our seven outfalls, we plan on taking storm water samples of only one outfall, #4. The reason for this is that, as stated earlier, four of our outfalls are either recycled or are non-contact cooling water. The remaining three are draining the dock area and will have similar characteristics. In fact, these three outfalls, #4, 5, 6, are fed from a common trench that runs the length of the dock.